

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ARNO ENZERINK

Plaintiff,

- against -

CRANBURY OVERSEAS LIMITED
LIABILITY COMPANY

Defendant.

Docket No. 1:20-cv-00292-EK-CLP

NOTICE OF MOTION

PLEASE TAKE NOTICE, upon the declaration of Richard Liebowitz, and the exhibits annexed thereto, the Statement of Damages and upon all prior papers and proceedings filed herein, Plaintiff Arno Enzerink (“Plaintiff”) will move the Hon. Eric R. Komitee at the United States Courthouse, 225 Cadman Plaza, Brooklyn, NY 11201, at a time and place determined by Court for default judgment against Cranbury Overseas Limited Liability Company (“Defendant”) pursuant to Rule 54(b) and Rule 55(b) of the Federal Rules of Civil Procedure for the following relief:

1. Directing that a default judgment as to liability for copyright infringement under 17 U.S.C. § 501 be entered against Defendant;
2. Ordering Defendant to pay \$30,000.00 in statutory damages under 17 U.S.C. § 504(c) for copyright infringement;
3. Ordering Defendant to pay \$1912.50 in attorneys’ fees and \$440.00 in costs under 17 U.S.C. § 505;
4. Ordering Defendant to pay post-judgment interest under 28 U.S.C.A. § 1961;

5. Directing that the Court retain jurisdiction over any matter pertaining to this judgment;
6. Ordering dismissal of this case and directing the Clerk of the Court to remove it from the Court docket; and

PLEASE TAKE FURTHER NOTICE, that service of a copy of this order and annexed affidavit and exhibits upon Defendant be made by U.S. mail at Defendant's last known business address on or before _____, _____, which shall be deemed good and sufficient service thereof. Any opposition to entry of a default judgment is due on or before _____, _____. Any reply is due by _____, _____.

TO:

Cranbury Overseas Limited
Liability Company
964 Sanford Avenue
Irvington, NJ 07083